SOUTHERN DISTRICT OF NEW YORK	<
UNITED STATES DISTRICT COURT	

LIGHTHOUSE FINANCIAL GROUP, Individually and on Behalf of All Others Similarly Situated, 11 Civ. 398 (GBD)

Plaintiff,

**ECF** Case

vs.

THE ROYAL BANK OF SCOTLAND GROUP, PLC, et al.,

Defendants.

## SUPPLEMENTAL DECLARATION OF SHAUNA K. FRIEDMAN

- I, Shauna K. Friedman, hereby declare as follows:
- 1. I am a senior associate at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, at 399 Park Avenue, New York, New York 10022, counsel for Royal Bank of Scotland Group plc ("RBS") in this lawsuit.
- 2. I submit this supplemental declaration in further support of the Royal Bank of Scotland Group plc's Motion to Dismiss the Consolidated Amended Complaint for Failure to State a Claim, dated January 13, 2012.
- 3. Attached hereto as Exhibit 1 is a true and accurate copy of Judge Kaplan's March 16, 2012 Order in *NECA-IBEW Pension Trust Fund v. Bank of America Corporation*, No. 10-cv-00440 (S.D.N.Y. Mar. 16, 2012).
- 4. Attached hereto as Exhibit 2 is a true and accurate copy of Magistrate Judge Pitman's February 9, 2012 Report and Recommendation in *NECA-IBEW Pension Trust Fund v. Bank of America Corporation*, No. 10-cv-00440 (S.D.N.Y. Feb. 9, 2012).

5. Attached hereto as Exhibit 3 is a true and accurate copy of an excerpt from the Financial Services Authority Board Report, *The Failure of the Royal Bank of Scotland* (December 12, 2011). The entire Report is available at http://www.fsa.gov.uk/library/other\_publications/miscellaneous/2011/rbs.shtml.

6. Attached hereto as Exhibit 4 is a true an accurate copy of an excerpt from Royal Bank of Scotland Group plc Annual Report for the Fiscal Year Ended December 31, 2008 (Form 20-F), filed with the SEC on April 29, 2009.

7. Attached hereto as Exhibit 5 is a true an accurate copy of an article by Patrick Hosking entitled *RBS says it knew sub-prime risk as it reveals £1.5bn of write-offs*, published in The Times (London) on December 7, 2007.

8. I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, New York on April 12, 2012.

Shauna K. Friedman